

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

CR 05-1849 JH

RALPH GREENE,

Defendant.

UNOPPOSED MOTION TO CONTINUE SENTENCING

COMES NOW Ralph Greene through counsel Edward Bustamante and respectfully moves this honorable court issue an order vacating the February 24, 2011, sentencing currently set in this cause and reset the matter as soon as practicable.

As grounds defense counsel states:

1. Due to an unusually hectic trial and court schedule defense counsel has not had sufficient time to prepare the matter for sentencing.

2. Defense counsel is in the process of compiling and distributing multiple letters in support of Mr. Greene.

3. Both parties are requesting further time to prepare the sentencing in this complex matter.

4. Mr. Greene is compliant with all conditions of release.

5. Defense counsel is exercising due diligence in preparing this matter as is the United States Attorney.

6. This motion is not for the purpose of delay.

7. Supervisory United States Attorney James Braun does not oppose.

Based on the above, defense counsel respectfully moves the Court continue the February 24, 2011 sentencing. Defense counsel respectfully requests the Court reschedule the matter in approximately sixty (60) days.

Respectfully submitted by

/s/

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This certifies a copy of this motion was electronically sent to James Braun, SUSA on February 19, 2011.

/s/

EDWARD O. BUSTAMANTE